The Honorable James L. Robart 1 2 3 4 5 UNITED STATES DISTRICT COURT 6 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 8 MICROSOFT CORPORATION, a Washington corporation, CASE NO. C10-1823-JLR 9 Plaintiff, DEFENDANTS' COMBINED REPLY 10 TO: 11 v. (A) MOTOROLA'S MOTION TO FILE DOCUMENTS UNDER SEAL IN SUPPORT 12 MOTOROLA, INC., and MOTOROLA OF ITS OPPOSITION TO MICROSOFT'S MOBILITY, INC., and GENERAL MOTION FOR SUMMARY JUDGMENT 13 INSTRUMENT CORPORATION, BRIEF OF CONTRACT (ECF NO. 271); AND 14 Defendants. (B) MOTOROLA'S MOTION TO FILE 15 DOCUMENTS UNDER SEAL IN SUPPORT OF ITS REPLY IN SUPPORT OF ITS 16 MOTOROLA MOBILITY, INC., and MOTION FOR PARTIAL SUMMARY GENERAL INSTRUMENT CORPORATION. JUDGMENT (ECF NO. 287) 17 NOTED ON MOTION CALENDAR: Plaintiffs/Counterclaim Defendant, 18 Friday, May 4, 2012 19 v. 20 MICROSOFT CORPORATION, 21 Defendant/Counterclaim Plaintiff. 22 23 24 25 26

DEFENDANTS' COMBINED REPLY RE MOTIONS TO SEAL CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

Case 2:10-cv-01823-JLR Document 307 Filed 05/04/12 Page 2 of 4

1	Because Motorola meets the standards for sealing as discussed in its moving briefs (ECF
2	Nos. 271 and 287) and because Microsoft does not oppose Motorola's Motions to File Documents
3	Under Seal, and offers additional support why documents should be sealed, Motorola respectfully
4	requests that the Court grant both Motions.
5	DATED this 4th day of May, 2012.
6	SUMMIT LAW GROUP PLLC
7	By <u>/s/ Ralph H. Palumbo</u>
8	Ralph H. Palumbo, WSBA #04751 Philip S. McCune, WSBA #21081
	Lynn M. Engel, WSBA #21031
9	ralphp@summitlaw.com
	philm@summitlaw.com
10	lynne@summitlaw.com
11	By /s/ K. McNeill Taylor, Jr.
12	K. McNeill Taylor, Jr.
	MOTOROLA MOBILITY, INC. MD W4-150
13	600 North U.S. Highway 45
1.4	Libertyville, IL 60048-1286
14	Phone: 858-404-3580
15	Fax: 847-523-0727
16	And by
17	Steven Pepe (pro hac vice)
1/	Jesse J. Jenner (pro hac vice)
18	Stuart W. Yothers (pro hac vice)
	Ropes & Gray LLP
19	1211 Avenue of the Americas
20	New York, NY 10036-8704
20	(212) 596-9046 steven.pepe@ropesgray.com
21	jesse.jenner@ropesgray.com
	stuart.yothers@ropesgray.com
22	N HD (1 · ·)
23	Norman H. Beamer (<i>pro hac vice</i>) Gabrielle E. Higgins (<i>pro hac vice</i>)
24	Ropes & Gray LLP
24	1900 University Avenue, 6 th Floor East Palo Alto, CA 94303-2284
25	(650) 617-4030
	norman.beamer@ropesgray.com
26	gabrielle.higgins@ropesgray.com

DEFENDANTS' COMBINED REPLY RE MOTIONS TO SEAL - 1 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

Case 2:10-cv-01823-JLR Document 307 Filed 05/04/12 Page 3 of 4

1	Paul M. Schoenhard (pro hac vice)
2	Kevin J. Post (pro hac vice) Ropes & Gray LLP
3	One Metro Center 700 12 th Street NW, Suite 900
4	Washington, DC 20005-3948 (202) 508-4693
5	paul.schoenhard.@ropesgray.com kevin.post@ropesgray.com
6	Attorneys for Motorola Solutions, Inc., Motorola
7	Mobility, Inc., and General Instrument Corporation
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

DEFENDANTS' COMBINED REPLY RE MOTIONS TO SEAL - 2 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001 1 2

CERTIFICATE OF SERVICE

Danielson, Harrigan, Leyh & Tollefson LLP

2

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Arthur W. Harrigan, Jr., Esq.

Christopher T. Wion, Esq. Shane P. Cramer, Esq.

3

4

5

6

7

8

9

10

11

12

13

1415

16

17

18

19

20

21

22

23

2425

26

arthurh@dhlt.com chrisw@dhlt.com shanec@dhlt.com Richard A. Cederoth, Esq. Brian R. Nester, Esq. David T. Pritikin, Esq. Douglas I. Lewis, Esq. John W. McBride, Esq. David Greenfield, Esq. William H. Baumgartner, Jr., Esq. David C. Giardina, Esq. Carter G. Phillips, Esq. Constantine L. Trela, Jr., Esq. Ellen S. Robbins, Esq. Nathaniel C. Love, Esq. Sidley Austin LLP rcederoth@sidley.com bnester@sidley.com dpritikin@sidley.com dilewis@sidley.com iwmcbride@sidlev.com david.greenfield@sidley.com wbaumgartner@sidley.com dgiardina@sidley.com cphillips@sidley.com ctrela@sidley.com erobbins@sidley.com nlove@sidley.com T. Andrew Culbert, Esq. David E. Killough, Esq.

DATED this 4th day of May, 2012.

Microsoft Corp.

andycu@microsoft.com davkill@microsoft.com

> /s/ *Marcia A. Ripley* Marcia A. Ripley

DEFENDANTS' COMBINED REPLY RE MOTIONS TO SEAL - 3 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

4822-9184-1039.2